

April 13, 1998

Eileen S. Stommes, Deputy Administrator  
USDA - AMS-TM-NOP Room 4007-S, Ag Stop 0275  
PO Box 96456  
Washington, DC 20090-6456

RE: Comment on National Organic Program  
Proposed Rule-Docket Number: TDM-94-00-2

Dear Ms. Stommes:

As a US Citizen and consumer of Coleman Natural Meat products, I am disturbed by the proposed National Organic Standards. Though most of the proposed standards are of concern to me, I will limit my comments below to the few sections of greatest concern for me, and presumably most US consumers.

**SECTION 205.103**

Comment: I oppose this section because I am entitled to clear labeling information. All consumers have the right to know what is in the products we buy in order to make informed choices for our families. The companies that make the products also have the responsibility to provide us with truthful and factual information about their products, so we can make an intelligent decision. For example, labels should specifically state that a product came from an animal that was "raised without hormones," "raised without the use of antibiotics," and "raised humanely."

This is true regardless of whether or not the product is organic. I am willing to pay a premium for products like those of Coleman Natural Meat because I know I am getting a better tasting, healthier product that is safer (hormone and antibiotic free) and is raised humanely. But I will only buy these products if the label includes all of the critical information about the handling, production and manufacturing processes so I can ensure that I am getting what I'm paying for.

Additionally, the definition of the term "organic" is confusing and misleading. According to the standards, a label can say "organic" and yet the cattle can be given antibiotics, growth hormones and fed up to 20% non-organic feed (which could contain herbicides and pesticides). I would be paying up to 100% more for "organic" meat and not getting a higher quality meat, nor a meat that is 100% organic.

**SECTION 205.14 and 205.22**

Comment: I oppose the use of antibiotics and animal drugs in livestock sold as "organic."

**SECTION 205.13**

Comment: I oppose the use of 20% non-organic feed (including genetically engineered grains) being used for livestock producing meat and other products labeled "organic".

**SECTION 205.12**

Comment: I oppose this section because NO difference should be made between animals producing organic edible products from those used to produce non-edible products (e.g.; pharmaceuticals, soaps and cosmetics labeled "organic").

I respectfully submit my comments to you, and request the USDA represent only the highest standards for individual organic food consumers, and not to bow to the pressure and economic interests of big business, who should not be allowed to quash the individual citizen's right for more information (on the label for example, section 105.103), in the name of higher profits for a lesser quality product.

Sincerely,

Concerned US Citizen